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In re

BRETT A. AXELROD, ESQ. 1 Nevada Bar No. 5859 NICHOLAS A. KOFFROTH, ESQ. Nevada Bar No. 16264 3 FOX ROTHSCHILD LLP 1980 Festival Plaza Drive, Suite 700 4 Las Vegas, Nevada 89135 5 Telephone: (702) 262-6899 Facsimile: (702) 597-5503 6 Email: baxelrod@foxrothschild.com nkoffroth@foxrothschild.com 7 Counsel for Debtor

## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF NEVADA

CASH CLOUD, INC., Chapter 11 dba COIN CLOUD, **DECLARATION OF DANIEL AYALA IN** Debtor. SUPPORT OF DEBTOR'S OBJECTION TO LATE FILED ADMINISTRATIVE EXPENSE CLAIM OF EMILY LEE

> Hearing Date: February 7, 2024 Hearing Time: 9:30 a.m.

Case No. BK-23-10423-mkn

- I, Daniel Ayala, declare as follows:
- I am the Independent Director of Cash Cloud, Inc., dba Coin Cloud, the debtor and 1. debtor-in-possession (the "Debtor").
- 2. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would testify competently to the facts set forth in this Declaration.<sup>1</sup> I make this Declaration in support of the objection captioned above ("Objection").

<sup>&</sup>lt;sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings ascribed them in the Objection.

3.	Debtor has determined that the Lee Claim was filed after the Bar Date. Debtor has
also deterr	mined that Ms. Lee had proper notice of the Bar Date. See the Certificate of Service [ECF
No. 884].	Ms. Lee was listed on the Certificate of Service at her last known address on file with
Debtor.	

4. Ms. Lee has not filed a motion under Rule 3002(c)(6) contending that the notice of the Bar Date received was insufficient, or filed a motion under Rule 9006(c)(1) contending that her failure to file the Lee Claim after the Bar Date was a result of excusable neglect.

I declare, under penalty of perjury of the laws of the United States of America, that the foregoing statements are true and correct to the best of information, knowledge and belief.

Executed this 4th day of January 2024 in Las Vegas, Nevada.

/s/Daniel Ayala
Daniel Ayala